

BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

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JUN 13 1997

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the Existing)
Television Broadcast Service)
)

MM Docket No. 97-268

Directed to: The Commission

PETITION FOR RECONSIDERATION

Quincy Newspapers, Inc. ("QNI") hereby respectfully submits its Petition for Reconsideration with respect to the Commission's *Fifth and Sixth Reports and Orders* in the above-captioned proceeding.

QNI owns and operates, either in its own right or through its subsidiaries, stations WREX-TV, Rockford, Illinois; WGEM-TV, Quincy, Illinois; WSJV(TV), Elkhart, Indiana; WVVA(TV), Bluefield, West Virginia; KTIV(TV), Sioux City, Iowa; and KTTC(TV), Rochester, Minnesota. For the reasons set forth below, QNI is very concerned about the DTV allotments its stations have received from the Commission. Accordingly, QNI asks that the Commission amend its DTV allotment table to address the problems identified below, or, in the alternative, release all technical information necessary to allow QNI to supplement this Petition with additional allotment proposals.

WREX-TV and WGEM-TV were assigned DTV channel 54, which is outside the DTV channel "core." This means that at the end of the DTV transition period, WREX and WGEM will have relocate to a DTV allotment inside the core, at

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considerable extra expense. Similarly, WSVJ(TV) was assigned DTV channel 58, which again is outside the core. As a preliminary matter, QNI has reviewed its options and determined that DTV channel 25 might be a feasible alternative for WSVJ, and that DTV channel 28 would be a feasible option for WGEM. QNI also notes that WSVJ's NTSC signal will suffer 10% new DTV interference under the FCC's current allotment table. Relatively few other stations in the table suffer as much DTV-NTSC interference.

In addition, station WVVA was issued DTV channel 46; its NTSC allotment is channel 6. If the FCC does not expand the "core" to include VHF channels 2-6, WVVA (unlike its competitors) will not have the option of returning to its NTSC channel, which has substantial brand name recognition in the market. Also, the area in and around Bluefield, West Virginia is mostly mountainous terrain. Propagation of DTV or NTSC signals in the UHF band in mountainous terrain presents several potential problems. As a result, WVVA's DTV allotment replicates only 94.2% of the station's analog coverage. Accordingly, QNI would like to request an allocation change to DTV channel 23 in Zone 2, and further requests that the FCC allow stations such as WVVA to use on-channel repeaters to eliminate any coverage shortfalls caused by DTV interference.

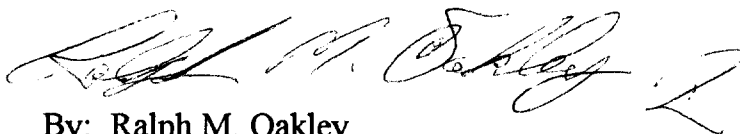
Finally, station KTIV was assigned DTV channel 41; its NTSC allotment is channel 4. Once again, if the FCC does not expand the "core" to include VHF channels 2-6, KTIV, like WVVA, will not have the option of returning to its NTSC

channel, which has substantial brand name recognition in its market as well. This effectively raises KTIV's and WVVA's cost of DTV implementation significantly and puts both stations at a considerable disadvantage vis-a-vis their competitors.

Moreover, KTIV uses three translators (located at Norfolk, O'Neill and Neleigh, Nebraska, respectively) which are critical to the rural areas within the station's market. The same is true of station KTTC, which uses translators at Winona, Blue Earth, and Fairmont, Minnesota, and at La Crosse, Wisconsin. If spectrum for translators is lost by virtue of DTV implementation, QNI urges the FCC to allow the use of translators or on-channel repeaters to compensate for the reduction in service to smaller communities.

Respectfully submitted,

QUINCY NEWSPAPERS, INC.

A handwritten signature in dark ink, appearing to read "Ralph M. Oakley", followed by a large, stylized flourish or checkmark.

By: Ralph M. Oakley
Vice President - Broadcast Operations

June 13, 1997